Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW, Room TW - A306 Washington, DC 20554

Karen Majcher Vice President, High Cost & Low Income Division Universal Service Administrative Company 2000 L Street, NW, Suite 200 Washington, DC 20036

Regulatory Commission of Alaska 701 West Eighth Avenue, Suite 300 Anchorage, Alaska 99501-3469

RE: Annual Reporting for High-Cost Recipients Pursuant to 47 C.F.R Section 54.313, WC Docket No. 10-90

To the Filing Representatives:

This filing is made pursuant to 47 C.F.R. § 54.313 Annual reporting requirements for high-cost recipients. Mukluk Telephone Company, Inc. hereby submits this Report and Affidavit.

Mukluk Telephone made similar filings with the State of Alaska on March 30, 2012 in compliance with Regulatory Commission of Alaska 3 AAC 53.460 Requirement to Provide Common Carrier Detail as a Designated Eligible Telecommunications Carrier.

Any questions or inquiries the Commission or Staff may have concerning this filing may be addressed directly to:

Robert W. Dunn TelAlaska, Inc. 201 E 56th Avenue Anchorage, AK 99518 (907) 563-2003

Submitted this 25th day of June, 2012.

By

Robert W. Dunn

**Director of Regulatory Affairs** 

**NetWorks** 

Interior Telephone

Mukluk Telephone

Cellular

**Eyecom Cable** 

**Long Distance** 



201 E. 56th Ave. Anchorage, AK 99518 907.563.2003 Fax 907.565.5539 www.telalaska.com

## MUKLUK TELEPHONE COMPANY, INC.

Annual 54.313 Report of High-Cost Recipient

- (a) Any recipient of high-cost support shall provide:
- (2) Detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect
- (i) At least ten percent of the end users served in a designated service area; or
- (ii) A 911 special facility, as defined in 47 CFR 4.5(e).

Mukluk Telephone Company, Inc (MTC) had one qualifying outages to report during the prior calendar year January 1, 2011 through December 31, 2011. See Exhibit A.

(3) The number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. The carrier shall also detail how it attempted to provide service to those potential customers;

There have been no instances during the prior calendar year January 1, 2011 through December 31, 2011 subject to facility availability.

MTC works with its customers to extend facilities where feasible.

(4) The number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year;

Mukluk Telephone Company, Inc. received no known complaints reported to the Regulatory Commission of Alaska and no complaints reported to the Federal Communications Commission for its study area serving 2,781 lines.

(5) Certification that it is complying with applicable service quality standards and consumer protection rules;

Mukluk Telephone Company, Inc certifies that it is in compliance with applicable consumer protection and service quality standards as set forth in Alaska Administrative Rules 3 AAC 53.450 and consumer protection rules as defined in 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted and new hires are instructed on the programs as required by their job functions. See Certification at Exhibit B.

### MUKLUK TELEPHONE COMPANY, INC.

Annual 54.313 Report of High-Cost Recipient

(6) Certification that the carrier is able to function in emergency situations as set forth in §54.202(a)(2);

Mukluk Telephone Company, Inc certifies that it has and will continue to take steps to remain functional in emergency situations in compliance with requirements set forth in 47 CFR 54.202(a)(2).

MTC has twelve telecommunication local exchange serving areas. It uses (central office) switches from two different manufacturers (vendors) to provide the service. The manufacturers are Redcom and Genband (formerly Nortel). Additionally, two of its switches have remote nodes. The node manufacturers include Calix (formerly Occam) and AFC. Each central office and interconnecting network equipment site contains provisions for reserve power to keep all equipment operating without interruption at the busy-hour load following any failure of the primary electric power source. All switches have 12 hour battery back-up. The Nome switch (Nortel) has a back-up generator which will provide power indefinitely. The nodes have 8 hour battery back-up.

At all of MTC's local exchange service areas, it provides a stand-alone switch (not connected to other central offices) directly connected to two separate IXCs. There are separate cable routes to each IXC in 9 of the locations (3 are on the same facility without redundancy). If either route is damaged access to long distance is attainable through a dial around process. All of ITC's switches are non-blocking and capable of handling traffic spikes resulting from emergency situations.

Interior has established procedures to be followed by its employees in the event of emergencies.

See Certification at Exhibit B.

(h) Additional voice rate data. All incumbent local exchange carrier recipients of high-cost support must report all of their flat rates for residential local service, as well as state fees as defined pursuant to §54.318(e) of this subpart. Carriers must also report all rates that are below the local urban rate floor as defined in §54.318 of this subpart, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of January 1.

#### Voice rate data

Residential Local Service Rate - \$16.05 State Subscriber Line Charges \$3.75 State Universal Service Fee 9.5%

Mukluk Telephone Company, Inc. has no rates below the local urban rate floor of \$10.00 in 2011.

#### EXHIBIT A

March 10, 2011

R.C.A. RECEIVED

11 MAR 14 AN H: 56

Regulatory Commission of Alaska 701 West 8<sup>th</sup> Avenue, Suite 300 Anchorage, Alaska 99501-3469

**RE: Network Outage Notification** 

**Dear Commission:** 

Pursuant to 3 AAC 52.320(b) Mukluk Telephone Company (MTC) is submitting notification of a service outage to dial tone customers.

Exchange: Stebbins, Alaska

Date: Thursday March 3<sup>rd</sup>, 2011 7:30 a.m. to Saturday March 5<sup>th</sup>, 9:30 a.m.

Problem: Loss of dial tone services to most customers in Stebbins.

Cause: An early morning house fire that burned the structure to the ground burned our 300 pair cable and the AVEC electrical lines in front of the structure that burned down. Service was down to over 2/3<sup>rd</sup> of our customers.

Subscribers: Dial tone customers and AT&T and GCI circuits were all down. There was no local or long distance.

Solution: We dispatched a 2 man crew to Stebbins on Thursday afternoon, and they assessed the situation and found the 300 pair cable was melted beyond repair. We sent down on the next-available airplane 460 feet of replacement cable to repair the damaged section. Our Telecom Technicians were able to get temporary long distance back up and when the power came back on, some service was available. We completed our repair and service was restored to all customers by 9:30 a.m. Saturday March 5<sup>th</sup>, 2011.

If additional information is necessary, please feel free to contact me at (907) 563-2003

**Robert W Dunn** 

**Regulatory Affairs Director** 

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# MUKLUK TELEPHONE COMPANY, INC. Annual 54.313 Report of High-Cost Recipient

# **Exhibit B - Certifications**

In compliance with the following regulations, Mukluk Telephone Company, Inc., by
Brenda Shepard its <u>LEO</u> hereby certifies, subject
to the penalties for false statements imposed under 18 U.S.C.§1001, that:
47 CFR § 54.313(a)(5) – It will make reasonable efforts to comply with applicable service quality standards as stated in the Alaska Administrative Code 3 AAC 53.450 and consumer protection rules as defined in 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft.
47 CFR § 54.313(a)(6) – It will make reasonable efforts to function in emergency situations as set forth in 47 CFR §54.202(a)(2). It has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
Certified by: Sund Shysand
Brenda Shepard Printed Name
A = D